

1 Paul Swenson Prior, Esq.  
2 Nevada Bar No. 9324  
3 Hayley J. Cummings, Esq.  
4 Nevada Bar No. 14858  
5 SNELL & WILMER L.L.P.  
6 3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: [sprior@swlaw.com](mailto:sprior@swlaw.com)  
[hcummings@swlaw.com](mailto:hcummings@swlaw.com)

7       Attorneys for Defendants Vivida Dermatology f/k/a  
8       Fife Dermatology, PC d/b/a Surgical Dermatology &  
Laser Center, Douglas Fife, M.D., and Heather Fife

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 THOMAS MOONEY,

Plaintiff,

V.

15 FIFE DERMATOLOGY, PC, d/b/a  
16 SURGICAL DERMATOLOGY & LASER  
CENTER, DOUGLAS FIFE, M.D., and  
HEATHER FIFE.

## Defendants.

Case No. 2:17-cv-02191-JCM-EJY

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
REPLY IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT  
[ECF NO. 71]**

## **(Fourth Request)**

19 Pursuant to Federal Rules of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Defendants  
20 Vivida Dermatology f/k/a Fife Dermatology, PC d/b/a Surgical Dermatology & Laser Center  
21 (“Vivida” or the “Practice”), Douglas Fife, M.D. (“Dr. Fife”), and Heather Fife (collectively,  
22 “Defendants”), by and through their counsel of record, and Plaintiff Thomas Mooney (“Plaintiff”  
23 and together with Defendants, the “Parties”), by and through his counsel of record, for good cause  
24 shown, hereby stipulate and agree to extend Defendants’ deadline to file their Reply in Support of  
25 Defendants’ Motion for Summary Judgment [ECF No. 71] (the “Motion”) by one week, from  
26 Tuesday, May 31, 2022 to Tuesday, June 7, 2022 for the following reasons:

27 | / / /

28 | //

1       1. Defendants filed the Motion on Friday, February 11, 2022 [ECF No. 70].  
2       2. Plaintiff filed his Response to the Motion on Monday, April 25, 2022 [ECF No. 81].  
3       3. Defendants' Reply in Support of the Motion (the "Reply") is currently due on  
4 Tuesday, May 31, 2022.

5       4. Defendants' counsel has been diligently working on the Reply, but they require  
6 additional time in light of deadlines in other matters, an intervening holiday, and to account for pre-  
7 planned international business travel by the attorney primarily responsible for drafting the Reply.

8       5. Defendants further assert that there is good cause for an additional week to file their  
9 Reply to allow for input from key individuals who have been unable to provide input to date.

10      6. No prejudice will result due to the requested one-week extension.

11      7. This extension request is sought in good faith and is not made for the purpose of  
12 delay.

13      THEREFORE, for good cause shown, the Parties respectfully request an extension for  
14 Defendants to file their Reply in Support of the Motion for Summary Judgment [ECF No. 71] from  
15 Tuesday, May 31, 2022 to Tuesday, June 7, 2022.

16  
17 DATED this 26<sup>th</sup> day of May, 2022.

18 SNELL & WILMER L.L.P.

19 s/ Paul Swenson Prior

20 Paul Swenson Prior, Esq.  
Nevada Bar No. 9324  
21 Hayley J. Cummings, Esq.  
Nevada Bar No. 14858  
3883 Howard Hughes Parkway, Suite 1100  
22 Las Vegas, Nevada 89169

23 *Attorneys for Defendants Vivida Dermatology  
f/k/a Fife Dermatology, PC d/b/a Surgical  
Dermatology & Laser Center, Douglas Fife,  
M.D., and Heather Fife*

24  
25 IT IS SO ORDERED.

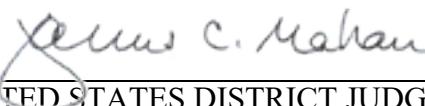
DATED this 26<sup>th</sup> day of May 2022.

KEMP & KEMP

s/ James P. Kemp (with permission)

James P. Kemp, Esq.  
Nevada Bar No. 6375  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130

*Attorneys for Plaintiff Thomas Mooney*

  
UNITED STATES DISTRICT JUDGE

DATED: May 27, 2022

Snell & Wilmer  
L.L.P.  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT [ECF NO. 71]** by method indicated below:

- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED this 26<sup>th</sup> day of May, 2022.

*/s/ Maricris Williams*  
An employee of SNELL & WILMER L.L.P.

4887-2078-9026.1